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November 18, 2013

Attn: Paul Massera  
California Water Plan Update 2013  
California Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236-0001

Dear Mr. Massera,

Tuolumne County has received and begun a review of the referenced California Water Plan Update 2013 (the Plan). While we appreciate the opportunity to comment on the Plan, given the length and complexity of the Plan we believe the comment deadlines to be unrealistically short. We therefore respectfully suggest that each deadline date be extended by at least one month or, alternatively, that DWR issue a revised draft following close of the current comment periods and then provide for a new comment period or periods of a more traditional length (120-180 days).

Given the current short comment periods, our comments in this letter will, for the most part be limited and targeted at specific portions of the Plan. Specifically, our general comments are limited to Volume 1 – The Strategic Plan. Given time constraints we are unable to make detailed comments on Volume 3 – Resource Management Strategies – prior to the December 2 deadline. However, we do have some very specific comments on Chapter 5 – Conveyance – Delta and those comments are found below. We will endeavor to make some limited comments on Volume 2 by the December 9 deadline, but repeat our request that all parties be given additional time within which to comment. Finally, we do reserve the right to provide additional comments as we are able going forward to the final publication of the Plan.

**VOLUME I -- THE STRATEGIC PLAN**

While we concur with what we believe to be one of the general premises of the Plan, that water planning is most effectively accomplished regionally, we also agree with the opening statement in the Mountain Counties Area chapter: *“As the State works to solve the water crisis in California, the potential for redirected impacts in the Mountain Counties Area is acute. It is critical that the State recognize the significance and importance of the Sierra Nevada mountain range to the local communities, the environment the Delta, and all of California, now and for future generations.”* That

concept is so central to any and all effective water planning both at the State and regional level that the statement above should not be solely buried in a single Area Plan that those in other areas may never read. Rather, it should be prominently placed up front in the beginning of the Plan in the Executive Summary. Further, there needs to be a universal understanding that informs water planning in all regions that planning in those regions must constantly be informed and constrained by limitations on and potential impacts of their regional planning on source regions as well. The County recommends that a socio-economic impact be done to assess how the citizens will be affected due to water diversions.

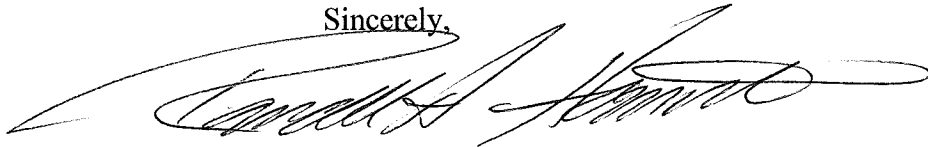
We also believe, and recommend addressing in the Executive Summary, the importance in water planning at all levels of understanding the complete interwoven context of environmental actions in other jurisdictions and disciplines and working to influence those jurisdictions to participate and cooperate in our planning process. Half of the State's water originates in Federal Lands. Federal regulatory guidelines and agencies that make decisions on how to implement those guidelines have a profound effect on our water supply, both in quantity and quality. For example, forestry management and habitat mitigation decisions have, over the past decades, resulted in severely overgrown forests in our Sierras. By some informed estimates this has resulted in a loss of up to 30% of the annual groundwater absorption, much of which would, if realized in the future, eventually find its way into our streams and rivers and finally into our taps and toilets. Also, although forest fires are a natural occurrence and actually can contribute positively to a healthy eco-system, in an un-healthy overgrown eco-system they result in catastrophic damage to the soils, vegetation, animal habitat and eventually the water quality in our streams and rivers. These negative impacts can take decades to fully address. It is paramount that the State takes the lead in engaging the appropriate Federal agencies that control the majority of our water at the source to become active participating and cooperating partners at all levels of our water planning process. We need the development of a comprehensive environmental approach that is based on real scientific information as opposed to supposition and speculation; one that acknowledges and accommodates the adverse impacts of decisions in one facet of the environment on other sectors including water availability; and one that supports and is supported by our State and regional water planning prerogatives. We believe there should be a separate chapter in Volume I -- Strategic Planning that lays out how the State plans to lead that effort and how that effort should migrate to and be effectively implemented into the regional water planning process. Again, while the need for this is alluded to in the Mountain Counties Area chapter, we believe this needs State-wide recognition and participation.

### **VOLUME 3, CHAPTER 5 -- CONVEYANCE -- DELTA**

Finally, there is another area of the State that has vital importance to and near universal impact on regional water planning throughout a majority of the State -- the Bay Delta. Tuolumne County recognizes the critical need to adequately plan for conservation within the Bay Delta. However, Tuolumne County categorically opposes the Bay Delta Conservation Plan in its current form. Specifically, we oppose the peripheral tunnels solution to improving water supply conditions for limited geographical areas supported by the Delta at the expense of all others that either feed water to or use water from the Delta. This solution is not in the best interests of the conservation of the Delta. In fact by diverting the inflow of a large quantity of fresh water from the Delta, this plan would exacerbate many of the current issues the Bay Delta Conservation Plan has been charged

with addressing and certainly create some new ones. This water serves a number of beneficial services to the Delta, such as salinity balancing (and a host of others), which would have to be addressed by adding a similar flow of water from elsewhere into the Delta. The obvious source of these necessary increased flows would be up-river reservoirs in the foothills and high Sierras. This will amount to the greatest diversion of water supply and encroachment on established water rights in the State's history. Further, it will necessarily have a severe negative impact, not just on the water supply and water quality in the Mountain Counties, but also on their local recreation and tourism economies and shut off any future possibility for significant economic growth. We find it ironic and disappointing that we will likely be required to fund a significant portion of our own economic demise since a majority of the \$14-\$50 billion price tag will most certainly be funded through either, or a combination of, a State General Obligation Bond or Federal appropriations. Finally, we recommend extending the comment period to allow a more in depth review of this important planning document.

Sincerely,

A handwritten signature in black ink, appearing to read "Randell A. Hanvelt", with a large, sweeping flourish extending from the end of the name.

RANDELL A. HANVELT  
Chairman, Board of Supervisors

Cc: Rural County Representatives of California  
California State Association of Counties  
Congressman Tom McClintock  
Senator Barbara Boxer  
Senator Dianne Feinstein  
Senator Tom Berryhill  
Assemblyman Frank Bigelow